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25 RASIER, LLC; and RASIER-CA, LLC

26 **UNITED STATES DISTRICT COURT**
27 **NORTHERN DISTRICT OF CALIFORNIA**
28 **SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF MICHAEL B.
SHORTNACY IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS
CASES FOR FAILURE TO COMPLY WITH
PTO 5**

This Document Relates to:

Date: October 3, 2025
Time: 10:00 a.m.
Courtroom: 6 – 17th Floor

D.P. v. Uber Technologies, Inc., et al.,
No. 3:24-cv- 04449-CRB

1 *Jane Roe CL 17 v. Uber Technologies,*
2 *Inc., et al.,* No. 3:24-cv-04915-CRB

3 *Jane Roe CL 37 v. Uber Technologies,*
4 *Inc., et al.,* No. 3:24-cv-05728-CRB

5 *Jane Roe CL 38 v. Uber Technologies,*
6 *Inc., et al.,* No. 3:24-cv-05729-CRB

7 *Jane Roe CL 67 v. Uber Technologies,*
8 *Inc., et al.,* No. 3:24-cv-06191-CRB

9 *Jane Roe CL 70 v. Uber Technologies,*
10 *Inc., et al.,* No. 3:24-cv-06863-CRB

11 *Jane Roe CL 71 v. Uber Technologies,*
12 *Inc., et al.,* No. 3:24-cv-06864-CRB

13 *Jane Roe CL 76 v. Uber Technologies,*
14 *Inc., et al.,* No. 3:24-cv-07569-CRB

15 *Jane Roe CL 77 v. Uber Technologies,*
16 *Inc., et al.,* No. 3:24-cv-07571-CRB

17 *Jane Roe CL 79 v. Uber Technologies,*
18 *Inc., et al.,* No. 3:24-cv-07587-CRB

19 *A.R. v. Uber Technologies, Inc., et al.,*
20 *No. 3:24-cv-08177-CRB*

21 *Jane Roe CL 81 v. Uber Technologies,*
22 *Inc., et al.,* No. 3:24-cv-08521-CRB

23 *Jane Roe CL 83 v. Uber Technologies,*
24 *Inc., et al.,* No. 3:24-cv-08525-CRB

25 *L.G. v. Uber Technologies, Inc., et al.,*
26 *No. 3:24-cv-09036-CRB*

27 *Jane Roe CL 88 v. Uber Technologies,*
28 *Inc., et al.,* No. 3:24-cv-09145-CRB

G.C. v. Uber Technologies, Inc., et al.,
No. 3:24-cv-09195-CRB

Jane Roe CL 91 v. Uber Technologies,
Inc., et al., No. 3:24-cv-09235-CRB

Jane Roe CL 92 v. Uber Technologies,
Inc., et al., No. 3:24-cv-09237-CRB

Jane Roe CL 93 v. Uber Technologies, Inc., et al., No. 3:24-cv-09549-CRB

Jane Roe CL 98 v. Uber Technologies, Inc., et al., No. 3:25-cv-00853-CRB

Jane Roe CL 101 v. Uber Technologies, Inc., et al., No. 3:25-cv-01118-CRB

Jane Roe CL 102 v. Uber Technologies, Inc., et al., No. 3:25-cv-01120-CRB

Jane Roe CL 107 v. Uber Technologies, Inc., et al., No. 3:25-cv-01470-CRB

Jane Roe CL 109 v. Uber Technologies, Inc., et al., No. 3:25-cv-01652-CRB

Jane Roe CL 110 v. Uber Technologies, Inc., et al., No. 3:25-cv-01653-CRB

Jane Roe CL 114 v. Uber Technologies, Inc., et al., No. 3:25-cv-01942-CRB

C.B. v. Uber Technologies, Inc., et al., No. 3:25-cv-01961-CRB

Jane Roe CL 118 v. Uber Technologies, Inc., et al., No. 3:25-cv-02132-CRB

Jane Roe CL 119 v. Uber Technologies, Inc., et al., No. 3:25-cv-02133-CRB

Jane Roe CL 122 v. Uber Technologies, Inc., et al., No. 3:25-cv-02138-CRB

Jane Roe CL 126 v. Uber Technologies, Inc., et al., No. 3:25-cv-02495-CRB

Jane Doe NLG (PB) v. Uber Technologies, Inc., et al., No. 3:25-cv-02938-CRB

Jane Roe CL 138 v. Uber Technologies, Inc., et al., No. 3:25-cv-03137-CRB

Jane Roe CL 139 v. Uber Technologies, Inc., et al., No. 3:25-cv-03255-CRB

Jane Roe CL 147 v. Uber Technologies, Inc., et al., No. 3:25-cv-03811-CRB

1 *Jane Roe CL 148 v. Uber Technologies,*
2 *Inc., et al., No. 3:25-cv-03812-CRB*

3 *Jane Roe CL 150 v. Uber Technologies,*
4 *Inc., et al., No. 3:25-cv-03815-CRB*

5 *Jane Roe CL 151 v. Uber Technologies,*
6 *Inc., et al., No. 3:25-cv-03816-CRB*

7 *Jane Roe CL 158 v. Uber Technologies,*
8 *Inc., et al., No. 3:25-cv-04038-CRB*

9 *Jane Roe CL 160 v. Uber Technologies,*
10 *Inc., et al., No. 3:25-cv-04205-CRB*

11 *Jane Roe CL 161 v. Uber Technologies,*
12 *Inc., et al., No. 3:25-cv-04206-CRB*

13 *Jane Roe CL 164 v. Uber Technologies,*
14 *Inc., et al., No. 3:25-cv-04587-CRB*

15 *Jane Roe CL 165 v. Uber Technologies,*
16 *Inc., et al., No. 3:25-cv-04589-CRB*

17 *Jane Roe CL 166 v. Uber Technologies,*
18 *Inc., et al., No. 3:25-cv-04591-CRB*

19 *Jane Roe CL 167 v. Uber Technologies,*
20 *Inc., et al., No. 3:25-cv-04670-CRB*

21 *Jane Roe CL 169 v. Uber Technologies,*
22 *Inc., et al., No. 3:25-cv-04672-CRB*

23 *Jane Roe CL 170 v. Uber Technologies,*
24 *Inc., et al., No. 3:25-cv-04705-CRB*

DECLARATION OF MICHAEL B. SHORTNACY

I, Michael B. Shortnacy, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Los Angeles, California. I respectfully submit this declaration in support of Defendants Uber Technologies, Inc.’s, Rasier, LLC’s, and Rasier-CA, LLC’s (collectively, “Uber’s”) motion to dismiss the cases of certain Plaintiffs represented by for noncompliance with PTO 5.

2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., representing Uber in this MDL as well as in Judicial Council Coordination Proceeding No. 5188, *In Re: Uber Rideshare Cases*, Case No. CJC-21-005188 (the “JCCP”). I am a member in good standing of the Bar of the State of California, the Bar of the District of Columbia Court of Appeals, and the Bar of the State of New York. I make this declaration based upon matters within my own personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

3. On December 28, 2023, this Court entered Pretrial Order No. 5 (“PTO 5”) in this matter, requiring each Plaintiff to “produce to Defendants a bona fide ride receipt from an Uber trip connected to the alleged incident.” ECF No. 175 at 2. PTO 4 required each Plaintiff whose case was a part of the MDL by February 1, 2024, to produce the receipt (or, if a receipt was not readily available, certain ride information) within 14 days of that date—i.e., by February 15, 2024. *Id.* Each Plaintiff who joined the MDL after February 1, 2024 had to produce the ride receipt or information within 14 days of joining. *Id.* at 3.

4. Attached to this declaration as **Exhibit A** is a table identifying 47 Plaintiffs who, as of the date of this Declaration, have failed to produce a ride receipt or information by their deadline to do so. The Plaintiffs’ deadlines are identified in the table at Exhibit A.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on August 12, 2025 in Los Angeles, California.

SHOOK, HARDY & BACON L.L.P.

/s/ Michael B. Shortnacy

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